

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 15 C 0081
)	
HUBER, INC., LLC,)	JUDGE MANISH S. SHAH
an Ohio limited liability company,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, HUBER, INC., LLC, an Ohio limited liability company, in the total amount of \$2,067.22, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,743.00.

On January 20, 2015, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to her personally at her place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 10, 2015.

On February 10, 2015, Defendant filed a *pro se* Answer to Plaintiffs' Complaint. However, on April 1, 2015, this Court struck the Defendant's answer as Defendant cannot proceed *pro se*.

As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan _____

Patrick N. Ryan
Attorney for the Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 15th day of June 2015:

Ms. Stephanie A. Huber, Registered Agent
Huber, Inc., LLC
1581 Goodman Avenue
Cincinnati, OH 45224

/s/ Patrick N. Ryan

Patrick N. Ryan
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